

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i> Plaintiffs, v. National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., Defendants.	Civ. Action No.: 14-cv-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO
DETERMINE PROPER ADMINISTRATION OF CLAIMS UNDER THE
SETTLEMENT AGREEMENT**¹

The National Football League and NFL Properties LLC (the “NFL Parties”) and Co-Lead Class Counsel (collectively, the “Parties”) respectfully move for an extension of time to respond to the Motion to Determine Proper Administration of Claims Under the Settlement Agreement filed by Anthony Allen, Brandon Banks, Josh Bell, Fred Bennett, Michael Coe, Emanuel Cook, Dedrick Epps, Steven Harris, Javarris James, Stefan Logan, Tony Nathan, Durwood Roquemore, Maurice Smith, Reggie Smith,

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

Eric Streater and Cornell Webster [Doc. # 8267] (the “Motion”) to September 28, 2017.

In support thereof, the Parties state as follows:

1. On August 15, 2017, Allen and the other movants filed the Motion seeking certain modifications to the Settlement Program, including the Notices of Claim Package Deficiency (“Notices”) that were issued to them.

2. Responses to the Motion are currently due on August 29, 2017

3. The Parties are facing a substantial number of other upcoming deadlines and activities in these MDL proceedings.

4. The Parties are currently working with the Claims Administrator to better understand the facts relating to pending Claims Packages of each of the movants.

5. The extension will not delay these proceedings or prejudice any party.

6. The Notices for each of the movants, with the exception of Webster, were issued on July 18, 2017 with a response date of November 15, 2017. Webster’s Notice was issued on July 7, 2017 with a response date of November 6, 2017.

7. On August 21, 2017 and August 22, 2017, Co-Lead Class Counsel conferred with Counsel for the movants to request an extension for any response to the Motion. Counsel for the movants stated that he opposes any extension.

8. This is the Parties’ first request for an extension of time to respond to the Motion.

WHEREFORE, the NFL Parties and Co-Lead Class Counsel respectfully request that the Court grant this motion to extend time for responding to the Motion to September 28, 2017.

Dated: August 22, 2017

Respectfully Submitted:

/s/ Christopher Seeger

Christopher Seeger

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on August 22, 2017.

/s/Christopher A. Seeger
Christopher A. Seeger